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13 14 15	Lead Counsel for Lead Plaintiff International Trading Group, Inc. UNITED STATES I	DISTRICT COURT
16	DISTRICT O	F NEVADA
17 18 19 20	JOSE CHUNG LUO, Individually and on Behalf of All Others Similarly Situated, Plaintiff, vs. SPECTRUM PHARMACEUTICALS, INC., et) al.,	No. 2:21-cv-01612-CDS-BNW CLASS ACTION STIPULATION AND [PROPOSED] ORDER REGARDING SCHEDULE FOR SECOND AMENDED COMPLAINT AND RELATED BRIEFING
22	Defendants.	
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	4860-4006-9541.v1	

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Lead Plaintiff International Trading Group, Inc. ("Plaintiff") and defendants Spectrum 1 2 Pharmaceuticals, Inc., Joseph W. Turgeon, Kurt A. Gustafson, Francois J. Lebel, M.D., and Thomas 3 J. Riga (collectively, "Defendants," and together with Plaintiff, the "Parties"), by and through their 4 undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter 5 the below Order approving this Stipulation: 6 WHEREAS, on February 6, 2024, the Court granted without prejudice Defendants' Motion 7 to Dismiss the Amended Consolidated Class Action Complaint (ECF 82); 8 WHEREAS, Plaintiff intends to amend the Amended Consolidated Class Action Complaint; 9 and 10 WHEREAS, the Parties have met and conferred and, subject to Court approval, agree to the 11 below deadlines for the second amended complaint and motion to dismiss ("MTD") briefing 12 schedule. 13 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT: 14 1. Plaintiff shall file a second amended complaint on or before March 29, 2024; 15 2. Defendants shall file a motion to dismiss on or before May 13, 2024; 16 3. Plaintiff shall file an opposition to the MTD on or before June 27, 2024; 17 and 4. Defendants shall file a reply brief in further support of the MTD on or before July 22, 18 2024. 19 20 DATED: February 20, 2024 ROBBINS GELLER RUDMAN & DOWD LLP 21 RYAN A. LLORENS JEFFREY J. STEIN 22 JOHN M. KELLEY 23 s/ Jeffrey J. Stein 24 JEFFREY J. STEIN 25 26 27 28

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15	DATED: February 20, 2024	BAKER BOTTS L.L.P.
15 16	DATED: February 20, 2024	BAKER BOTTS L.L.P. KEVIN M. SADLER
	DATED: February 20, 2024	
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12	Counsel for Defendant Spectrum Pharmaceuticals, Inc.
13	Tharmaceutears, me.
14	* * *
15	ORDER
16	IT IS SO ORDERED.
17	DATED: 2/21/2024 Bentoweten
18	THE HONORABLE BRENDA WEKSLER UNITED STATES MAGISTRATE JUDGE
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